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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

This Document Relates To:

Sharp Electronics Corp., et al. v. Hitachi Ltd., et al.,
No. 13-cv-1173;

Sharp Elecs. Corp. et al. v. Koninklijke Philips
Elecs. N.V. et al., No. 13-cv-2776-SC.

Case No. 07-cv-5944 (SC)

MDL No. 1917

**DECLARATION OF CRAIG A.
BENSON IN SUPPORT OF
SHARP'S OPPOSITION TO JOINT
DEFENSE MOTION IN LIMINE
NO. 10 – MOTION TO EXCLUDE
EVIDENCE OF ANY ALLEGED
CDT PRICE-FIXING CONSPIRACY**

**[EXHIBITS A-L FILED UNDER
SEAL PURSUANT TO LOCAL
RULE 79-5]**

1 I, CRAIG A. BENSON, hereby declare as follows:

2 1. I am a Partner with the law firm of Paul, Weiss, Rifkind, Wharton &
3 Garrison LLP, counsel for Plaintiffs Sharp Electronics Corporation and Sharp Electronics
4 Manufacturing Company of America, Inc. (collectively, "Sharp"). I am a member of the bars of
5 the State of Maryland, the State of New York, and the District of Columbia, and I am admitted to
6 practice before this court *pro hac vice*.

7 2. I submit this Declaration in support of Sharp's Opposition to Joint
8 Defense Motion *in Limine* No. 10 – Motion to Exclude Evidence of Any Alleged CDT Price-
9 Fixing Conspiracy, dated February 13, 2015. I have personal knowledge of the facts stated
10 herein and could competently testify to these facts if called upon to do so.

11 3. Attached as Exhibit A is a true and correct copy of a certified translation
12 of the document produced at CHU00031006.

13 4. Attached as Exhibit B is a true and correct copy of a certified translation
14 of the document produced at CHU00021262E.

15 5. Attached as Exhibit C is a true and correct copy of relevant excerpts from
16 Volume I of the Deposition of Chih Chun-Liu, dated February 19, 2013.

17 6. Attached as Exhibit D is a true and correct copy of a certified translation
18 of the document produced at Bates number HDP-CRT00025646.

19 7. Attached as Exhibit E is a true and correct copy of a certified translation of
20 the document produced at Bates number SDCRT-0086537.

21 8. Attached as Exhibit F is a true and correct copy of the document produced
22 at Bates number JLJ-00001899.

23 9. Attached as Exhibit G is a true and correct copy of document produced at
24 Bates number PHLP-CRT-098241.

25 10. Attached as Exhibit H is a true and correct copy of a certified translation
26 of the document produced at Bates number SDCRT-0086487.

11. Attached as Exhibit I is a true and correct copy of the document produced at Bates number PTC-00007637.

12. Attached as Exhibit J is a true and correct copy of a certified translation of the document produced at Bates number MTPD-0400710.

13. Attached as Exhibit K is a true and correct copy of a certified translation of the document produced at Bates number CHU00014218.

14. Attached as Exhibit L is a true and correct copy of the document produced at Bates number TCE-CRT 0013596.

I declare under penalty of perjury, that the foregoing is true and correct. Executed
this 27th day of February, 2015, at Washington, DC.

/s/ *Craig A. Benson*

Craig A. Benson